

# EXHIBIT D

INDEX IN SUPPORT OF MOTION TO SEAL SAVEONSP'S MOTION TO COMPEL JJHCS TO  
ADD TRIALCARD CUSTODIANS AND RUN ADDITIONAL SEARCHES (ECF NOS. 489, 500 & 533)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to Add TrialCard Custodians and Run Additional Searches, dated January 3, 2025 (ECF No. 489)</u>		JJHCS requests the redaction of information in and exhibits to the January 3, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the January 3, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None, with the exception of Exhibit 82, which was sealed pursuant to ECF No. 510	None
Pages 4– 12 & 14 and notes 3, 5–16, 22– 25 & 28	Redactions discussing confidential exhibits	In addition, Exhibits 98-100 contain documents designated as Attorneys' Eyes Only – Confidential Health Information.	Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its			
Exhibits 1, 4 & 82	Redactions to discovery letters discussing confidential documents	Further, several of these exhibits were produced by non-party TrialCard				

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Exhibits 5, 15–23, 26–27, 29–32, 34, 35, 37–41, 43, 44, 48, 49, 52–68, 70–81, 83, 85–90, 97, 101–04 & 106–12	Sealing of emails and attachments discussing confidential information	pursuant to subpoenas and designated as Confidential – Attorneys’ Eyes Only.	competitors secured the information.  Additionally, disclosure of Confidential Health Information would also improperly reveal confidential health information to the public.			
Exhibits 24 & 25	Redactions to discovery responses and objections containing references to confidential information					

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Exhibits 28, 33, 42, 45, & 114	Sealing of confidential documents and presentations containing competitively sensitive information					
Exhibits 36, 46, 47, 50, 51, 69, 105 & 115	Sealing of confidential agreements and work orders containing competitively sensitive information					

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Exhibit 39	Sealing of confidential notes containing competitively sensitive information					
Exhibits 84, 91 & 92	Sealing of confidential spreadsheets containing competitively sensitive information					
Exhibits 98, 99 & 100	Sealing of confidential benefits investigations					

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<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to Motion to Compel JJHCS to Add TrialCard Custodians and Run Additional Searches, dated January 24, 2025 (ECF No. 500)</u>		JJHCS requests the redaction of information in and exhibits to the January 24, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information. In addition, Exhibits 13 and 14 were produced by non-party TrialCard pursuant to subpoenas and designated as Confidential – Attorneys’ Eyes Only.	If filed on the public docket, these portions of the January 24, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 7–12 & 14–16 and note 4	Redactions discussing confidential exhibits					
Exhibits 1 & 2	Sealing of confidential agreements containing competitively sensitive information					

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Exhibits 6, 8, 9, 13 & 14	Sealing of confidential documents and presentations containing competitively sensitive information		competitors secured the information.			
Exhibit 7	Sealing of email discussing confidential information					
Exhibit 12	Redactions to discovery letters discussing confidential documents					

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<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to SaveOnSP's Motion to Compel JJHCS to Add TrialCard Custodians and Run Additional Searches, dated February 10, 2025 (ECF No. 533)</u>		JJHCS requests the redaction of information in and exhibits to the February 10, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.  In addition, Exhibit 132 contains a document designated as Attorneys' Eyes Only –	If filed on the public docket, these portions of the February 10, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.  Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 3–8 and notes 3–7	Redactions discussing confidential exhibits					
Exhibit 116	Sealing of confidential work order					



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Exhibits 117, 119, 120, 122–24, 126–30, 134, 135, 138 & 139	Sealing of emails and attachments discussing confidential information	Confidential Health Information.  Further, several of these exhibits were produced by non-party TrialCard pursuant to subpoenas and designated as Confidential – Attorneys’ Eyes Only.	place JJHCS at a competitive disadvantage if its competitors secured the information.  Additionally, disclosure of Confidential Health Information would also improperly reveal confidential health information to the public.			
Exhibits 118, 131, 136 & 137	Sealing of confidential documents and presentations containing competitively sensitive information					
Exhibit 121	Sealing of confidential chat log discussing confidential information					

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Exhibit 125	Sealing of confidential spreadsheet					